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Peter Wendolkowski
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To: Peter Wendolkowski/DC/USEPA/US@EPA
cc:
cc:
Subject: Environmental Defense comments on the proposed N,N-Dimethylalkanamides category

Richard_Denison@environmentaldefense.org on 04/29/2003 03:59:40 PM

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Subject: Environmental Defense comments on the proposed N,N-Dimethylalkanamides category

(Submitted via Internet 4/29/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and gwentwor@cphall.com)

Environmental Defense appreciates this opportunity to submit comments on the Robust Summary/Test Plan for the proposed N,N-Dimethylalkanamides category.

Under the High Production Volume Challenge, the C.P. Hall Company has submitted a Test Plan/Robust Summary for two chemicals -- N,N-dimethyloctanamide (CAS # 1118-92-g) and N,N-dimethyldecanamide (CAS # 14433-76-2) -- with the proposal that they be considered together as a category. N,N-dimethyldecanamide is available commercially as Hallcomid M-10, whereas N,N-dimethyloctanamide is available only as part of a mixture of similar compounds marketed as Hallcomid M-8-10. Hallcomid M-8-10 contains approximately 50-65% N,N-dimethyloctanamide, with N,N-dimethyldecanamide as the secondary component and N,N-dimethylhexanamide and N,N-dimethyldodecanamide as minor components/impurities. According to the sponsor, these chemicals are used primarily as inert ingredients in pesticides. Minor uses are not mentioned.

On review of the Test Plan submitted for these compounds, we agree that these chemicals have very similar chemical structures and properties and should be considered together as a category. Our review also indicates the Test Plan is carefully prepared and well-organized, and presents and describes data addressing each of the requested SIDS elements for one or both of these chemicals. Given the similarities in chemical structure and properties, we feel it appropriate that data available for one of these chemicals be used to estimate the respective SIDS elements for the other. With exception of the chemical structures of these compounds, which were not provided, each of the requested SIDS elements is addressed by adequate data on one or both of these compounds. We also compliment the C.P. Hall Company for providing a list of references in the Test Plan for the sources of these data.

All available data indicate N,N-dimethyldecanamide and Hallcomid M-8-10 are moderately toxic to aquatic organisms and of low toxicity to birds and mammals. They are rapidly degraded in the environment and would not be expected to accumulate. Whereas they are mild irritants to the eyes and skin, they are not mutagenic and have no reproductive or developmental toxicity at doses that are not also toxic to the mothers.

Thank you for this opportunity to comment.

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